

Exhibit 1

7/25/25, 10:06 AM

Gmail - Document Productions [Jana v Walmart]



Dilip Jana <janadilip@gmail.com>

Document Productions [Jana v Walmart]

Dilip Jana <janadilip@gmail.com>

Thu, Jul 24, 2025 at 4:45 PM

To: Morgan.Jones@gtlaw.com, Dilip Jana <janadilip@gmail.com>

Cc: Peter.Wahby@gtlaw.com, Holmes.Hampton@gtlaw.com

Dear Ms. Jones,

Thank you for your email.

Respectfully, I reiterate that I requested specific clarification on July 21, 2025, regarding Walmart's July 18 production. To date, neither you nor Mr. Wahby has answered the questions I raised in that message, namely:

1. What is the basis and scope of the July 18 production?
2. Which discovery request(s) or disclosure obligation(s) does it purport to fulfill?
3. Are any documents designated as confidential or subject to the Protective Order?
4. Why was the production served without a Rule 26(g)-compliant signature or certification by counsel?

These are not technical access issues—they are core procedural and legal questions directly relevant to the production's validity and admissibility. The mere act of sending a file-sharing link, even with a password, does not satisfy Walmart's obligations under the Federal Rules of Civil Procedure. See Fed. R. Civ. P. 26(g)(1)(A); 34(b)(2)(B); and 37(a)(4).

Your latest message does not address these deficiencies. Until you provide a substantive response to my July 21 inquiry, I am unable to download or rely on the production without risking waiver, compromise of evidentiary rights, or inadvertent acceptance of noncompliant disclosures.

Please provide the requested clarification at your earliest convenience.

Kind regards,

Dr. Dilip Jana

Pro Se Plaintiff

800 Fairlawn St, Allen, TX 75002

janadilip@gmail.com | (318) 243-9743

On Mon, Jul 21, 2025 at 2:33 PM Dilip Jana <janadilip@gmail.com> wrote:

Dear Mr. Wahby,

I acknowledge receipt of Walmart's July 18, 2025 "Supplemental production", which includes password-protected files.

Please clarify the basis and scope of this production, including identification of the applicable discovery request or disclosure category, and whether Walmart designates any of these documents as confidential or subject to the Protective Order currently in effect.

I also note that the production lacks a Rule 26(g)-compliant signature or certification.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St, Allen, TX 75002

Ph: 318-243-9743

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Email: janadilip@gmail.com

On Thu, Jul 24, 2025 at 3:49 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip, it appears from your most recent filings and emails that there may be some confusion surrounding the file sharing links we have used to serve document productions in this case. The medium used is a standard file sharing software that can efficiently and securely transmit voluminous files. The file is password protected, but we provided the password to you. You can simply download the productions at your convenience. While the links expire (which is a standard feature of these types of file share systems) we can send new links to you if you are unable to download before the expiration date. Alternatively, if you are having difficulties accessing the documents through the link, we can look for another way to securely transmit the production.

Morgan Jones

Associate

Greenberg Traurig, LLP

2200 Ross Avenue | Suite 5200 | Dallas, TX 75201

T +1 214.665.3682 | F +1 214.665.3601

Morgan.Jones@gtlaw.com | www.gtlaw.com | View GT Biography



If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at postmaster@gtlaw.com, and do not use or disseminate the information.

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Thanks
Dilip